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February 16, 2022

Honorable John G. Koeltl United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re:

Federal Ins. Co v. Laufer Group and Yang Ming

21cv9992 (JGK)

M&K Ref: 12/4502 Our File: 527-08(c) MAY 5, 2022, 15 2:30PM

DIAL-IN: (888) 363-4749

Dear Honorable Judge Koeltl:

We represent the Plaintiff in the referenced matter.

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As set forth in the Court's Order dated February 4, 2022 [Docket # 16], Your Honor intends to ask V that Magistrate Judge Moses be assigned to this Case in order to coordinate discovery with the 2/ other pending cases involved in the M/V ONE APUS November 30, 2020 casualty and counsel herein intend to coordinate with counsel in the other pending cases regarding discovery. The parties assume that this Order supersedes the January 31, 2022 Order [Dkt # 14].

We also write to inform the Court that certain defendants filed a motion with the Multidistrict Litigation Panel to have all cases in the country be consolidated in the Southern District of New York for discovery purposes. [MDL Case No. 3028]. The MDL Panel has issued an order requiring a Response to the Motion be filed by March 3, 2022 and that any Reply be filed by March 10, 2022.

Finally, in respect to the conference currently scheduled for March 15, 2022, it is respectfully requested that Your Honor re-schedule the conference to another date. The undersigned, attorney for Plaintiff, has a conflict on that date.

Respectfully submitted,

CASEY & BARNETT, LLC Martin Cassy

Martin F. Casey

Garth Wolfson, Esq. cc: